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15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
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18 THEO CEDAR JONES

19 Plaintiff,

20 v.

21 CITY OF OAKLAND,

22 Defendants.

Case No. 3:23-cv-00166-WHO

**JOINT ADMINISTRATIVE MOTION TO
EXTEND TIME; DECLARATION OF
JAMILAH A. JEFFERSON IN
SUPPORT; ORDER**

Complaint Filed: January 12, 2023
Trial Date:

NOTICE OF ADMINISTRATIVE MOTION**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE THAT as soon as the matter may be heard (if necessary) before the Honorable William H. Orrick, at the above-entitled Court, located at 450 Golden Gate Avenue, San Francisco, California 94102, the parties will and hereby bring the instant joint administrative motion pursuant to Civil Local Rule 7-11 to extend the time within which plaintiffs in multiple related cases will file an amended complaint and Defendant City of Oakland will file a responsive pleading. To the extent necessary, the parties also seek to extend other related dates.

The joint administrative motion is based on this notice, the substantive request below, the Declaration of Jamilah A. Jefferson, the complete files of this case, and on any other matters, arguments, or evidence that may be presented to the Court at the hearing (if necessary).

Dated: September 29, 2023

BARBARA J. PARKER, City Attorney

By:



JAMILAH JEFFERSON, Superv. Deputy City Attorney
 N. N. TRAN, Senior Deputy City Attorney
 Attorneys for Defendant
 CITY OF OAKLAND

Dated: September 29, 2023

LAW OFFICE OF ANTHONY D. PRINCE

By: /s/ ANTHONY DAVID PRINCE

ANTHONY DAVID PRINCE
 Attorneys for Plaintiff
 JESSICA BLALOCK

ADMINISTRATIVE MOTION

Defendant City of Oakland and Plaintiff Jessica Blalock jointly submit the instant administrative motion pursuant to Civil Local Rule 7-11 to extend the time within which plaintiffs in multiple related cases will file an amended complaint and the City will file a responsive pleading.

The Court's August 15, 2023 Minute Order ("Order") directed all plaintiffs in multiple related cases to file an amended complaint no later than October 2, 2023 and the City to file an answer or responsive motion no later than November 22, 2023. [Dkt. No. 23]. The Order also explained that the parties were encouraged to "communicate informally in an effort to resolve or narrow disputes to the extent practicable." [Dkt. No. 23]. The Court also set a hearing on any responsive motion on January 17, 2024 and a further Case Management Conference on February 13, 2024.

Counsel for Plaintiff Jessica Blalock ("Counsel") recently represented to the City that he had a personal emergency that required him to travel immediately for at least a week. Counsel requested that the City agree to a brief continuance of 30-45 days of all the dates set in the Court's Order. The City agreed under the condition that all plaintiffs in the multiple related cases also agree to the brief continuance to allow the parties to continue to proceed on one track in the litigation. Counsel agreed to secure agreement from all plaintiffs in *Blalock v. City of Oakland, et. al.*, *Jones v. City of Oakland*, and *DeFigh v. City of Oakland* for the continuance. In addition, Counsel has indicated that he still intends to meet and confer with the City to determine if informal resolution may be possible. Such discussion has not yet occurred, but Counsel indicates that it will occur once he returns from his travel.

Accordingly, the parties request that the Court reset the dates in the Order as follows:

- Amended complaints filed no later than November 6, 2023;
- City's answer or responsive motions filed no later than December 8, 2023;
- Plaintiffs' oppositions to City's motions filed no later than January 5, 2024;
- City's replies filed no later than January 26, 2024;
- Hearing on the motion on or after February 9, 2024; and

- Further Case Management Hearing on or after March 6, 2024 with a joint case management statement filed on or after February 28, 2024.

The parties proposed the dates above intending to generally adhere to the timing and sequence of the dates in the Court's Order. Although the parties have proposed these dates (with consideration for the upcoming holidays), the parties are flexible based on the Court's calendar.

Dated: September 29, 2023

BARBARA J. PARKER, City Attorney

By:



JAMILAH JEFFERSON, Superv. Deputy City Attorney
HAN N. TRAN, Senior Deputy City Attorney
Attorneys for Defendant
CITY OF OAKLAND

Dated: September 29, 2023

LAW OFFICE OF ANTHONY D. PRINCE

By:

/s/ ANTHONY DAVID PRINCE

ANTHONY DAVID PRINCE
Attorneys for Plaintiff
JESSICA BLALOCK

DECLARATION OF COUNSEL

I, JAMILAH A. JEFFERSON, declare as follows:

1. I am a Supervising Deputy City Attorney for the City of Oakland, duly admitted to practice before all Courts of the State of California and the United States District Court for the Northern District of California. The matters set forth herein are known to me to be true, and if called upon, I would competently testify thereto.

2. The Court's August 15, 2023 Minute Order ("Order") directed all plaintiffs in multiple related cases to file an amended complaint and Defendant City of Oakland ("City") to file responsive motions by dates certain in the Order. The Order also encouraged the parties to "communicate informally in an effort to resolve or narrow disputes to the extent practicable."

3. Counsel for Plaintiff Jessica Blalock ("Counsel") recently represented to the City that he had a personal emergency that required him to travel immediately for at least a week. Counsel requested that the City agree to a brief continuance of 30-45 days of all the dates set in the Court's Order.

4. The City agreed under the condition that all plaintiffs in the multiple related cases also agree to the brief continuance to allow the parties to continue to proceed on one track in the litigation. Counsel agreed to secure agreement from all plaintiffs in *Blalock v. Oakland Police Dept., et. al., Jones v. City of Oakland*, and *DeFigh v. City of Oakland*.

5. Counsel has indicated that he still intends to meet and confer with the City to determine if informal resolution may be possible, but that discussion has not yet occurred and will occur once Counsel returns from his travel.

6. The parties propose the briefing schedule and hearing dates outlined in the accompanying administrative motion.

I declare under penalty of perjury under the laws of the State of California and United States of America that the foregoing is true and correct. Executed this 29th day of September 2023 in Oakland, California.


JAMILAH A. JEFFERSON

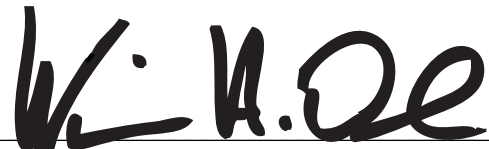
ORDER

Having read and considered the parties' Joint Administrative Motion to Extend Time and Declaration of Jamilah A. Jefferson in support, and for good cause shown, the joint request is GRANTED as follows:

- Amended complaints filed no later than November 6, 2023;
- City's answer or responsive motions filed no later than December 8, 2023;
- Plaintiffs' oppositions to City's motions filed no later than January 5, 2024;
- City's replies filed no later than January 26, 2024;
- Hearing on the motion on or after February 9, 2024; and
- Further Case Management Hearing on or after March 6, 2024 with a joint case management statement filed on or after February 28, 2024.

IT IS ORDERED.

Dated: October 2, 2023

A handwritten signature in black ink, appearing to read "W. H. Orrick", written over a horizontal line.

The Honorable William H. Orrick